

RICHARD BLUMENTHAL  
ATTORNEY GENERAL



2009 APR 24 PM 12:20:12

55 Elm Street  
P.O. Box 120  
Hartford, CT 06141-0120

Office of The Attorney General  
State of Connecticut

SENATE CLERK'S OFFICE  
RECEIVED ON 4/24/09

April 24, 2009

Thomas P. Sheridan  
Clerk of the Senate  
Room 305  
State Capitol  
Hartford, CT 06106

Dear Mr. Sheridan:

Pursuant to Conn. Gen. Stat. § 3-125a(b), I am hereby submitting to the General Assembly a settlement agreement between the State and the plaintiffs in the case of Maureen Allen, et al. v. John J. Armstrong, et al., United States District Court, District of Connecticut, Civil Action No. 3:02CV1370(WIG).

Very truly yours,

A handwritten signature in dark ink, appearing to read "Richard Blumenthal".

Richard Blumenthal

RB/RFK/sk

Enclosures

RICHARD BLUMENTHAL  
ATTORNEY GENERAL



55 Elm Street  
P.O. Box 120  
Hartford, CT 06141-0120

Office of The Attorney General  
**State of Connecticut**

April 24, 2009

RECEIVED  
2009 APR 26 PM 12:18  
OFFICE OF THE ATTORNEY GENERAL  
RECEIVED

Garey E. Coleman  
Clerk of the House of Representatives  
Room 109  
State Capitol  
Hartford, CT 06106

Dear Mr. Coleman:

Pursuant to Conn. Gen. Stat. § 3-125a(b), I am hereby submitting to the General Assembly a settlement agreement between the State and the plaintiffs in the case of Maureen Allen, et al. v. John J. Armstrong, et al., United States District Court, District of Connecticut, Civil Action No. 3:02CV1370(WIG).

Very truly yours,

A handwritten signature in dark ink, appearing to read "Richard Blumenthal".  
Richard Blumenthal

RB/RFK/sk

Enclosures

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

MAUREEN ALLEN, ET AL.,	:	CIVIL ACTION NO.
<i>Plaintiffs</i>	:	3:02CV1370(AVC)
	:	
v.	:	
	:	
JOHN J. ARMSTRONG, ET AL.,	:	
<i>Defendants</i>	:	March 13, 2009

**SETTLEMENT AGREEMENT**  
**AND GENERAL RELEASE**

WHEREAS, the above-captioned civil action was brought by and on behalf of Maureen Allen, Paulette Williams, Denna Stanley, Danielle Locas, Tanjorie R. Godwin, Sandra R. Gawron, Regina T. Arango, Barbara J. Hawkins, Carol Newman, Catherine Osten, Jane Doe One, Jane Doe Two, Jane Doe Three, (hereinafter “plaintiffs”), who are current or former employees of the Connecticut Department of Correction (hereinafter “DOC) in the United States District Court, District of Connecticut on or about August 8, 2002, against the DOC and several of its current or former officials and/or employees (hereinafter “defendants”); and

WHEREAS, the plaintiffs amended their complaint on or about September 11, 2002, January 23, 2003 and July 3, 2003, adding Gwendolyn Fuller-Lynch as an additional plaintiff, and have alleged violations of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e and the Civil Rights Act of 1991, and various other violations of state and federal statutes and constitutional provisions; and

WHEREAS, on or about February 9, 2004, Sandra R. Gawron filed with the Court a Notice of Voluntary Dismissal and the Court issued an order terminating Ms. Gawron from the

case on or about February 11, 2004 and as a result Ms. Gawron is not a party to this Agreement; and

**WHEREAS**, the parties recognize and acknowledge that Virginia Johnson, Katherine Johnston, Ferne McAllister, Audrey Riggins, and Janet Wade are additional plaintiffs who, although not formally added as plaintiffs, are included in this Agreement; and

**WHEREAS**, the defendants do deny and do not hereby admit that they have engaged in any act or practice in violation of any state or federal law; and

**WHEREAS**, the plaintiffs and the defendants (hereinafter collectively referred to as "parties") are desirous of settling the above-referenced actions, now pending between them; and

**WHEREAS**, the plaintiffs and the defendants agree that settlement of all the issues raised by the above-referenced action would best serve the interests of the parties; and

**WHEREAS**, the plaintiffs, having been given the opportunity to consult with their attorneys, have consented and do hereby consent to this Settlement Agreement and General Release (hereinafter "Agreement") and agree to be bound thereby; and

**WHEREAS**, the defendants, with advice and representation by their counsel, have consented and do hereby consent to this Agreement and agree to be bound thereby; and

**WHEREAS**, said parties have acknowledged, and by their consent hereto, do hereby acknowledge that they consent to this Agreement as their free act and deed, without coercion or duress;

**NOW THEREFORE**, for and in consideration of mutual covenants and promises set forth in this Agreement, the plaintiffs and defendants agree as follows:

1. The plaintiffs, through their counsel, shall immediately sign and return to defendant's counsel a Stipulation of Dismissal (an unexecuted copy of which is attached hereto

as "Exhibit A") and, in doing so, consent to a voluntary dismissal of this lawsuit (including plaintiffs' request for class certification), with prejudice, pursuant to Rule 41(a)(1)(ii), Federal Rules of Civil Procedure. Defendants' counsel will hold the Stipulation of Dismissal in escrow and file it with the Court at the time that the payments referred to in paragraph 4 below are made.

2. In consideration of the terms and conditions described in this Agreement, the plaintiffs for themselves, their heirs, and assigns hereby irrevocably, voluntarily and knowingly, covenant not to sue, and release and forever discharge the said defendants, their agents and employees, any agency of the State of Connecticut and any other former or future officers, servants, agents or employees of the State of Connecticut, both in their official and individual capacities, and the State of Connecticut itself, from any and all claims, grievances, demands, obligations, actions, causes of action, lawsuits, administrative proceedings, rights, damages, costs, loss of services, expenses and compensation of any nature whatsoever in any forum, whether based on tort, contract or other theory of recovery, for any and all matters from the beginning of time to the date of each plaintiff's signature on this Agreement that were raised or could have been raised in this case. Nothing contained in this Agreement shall constitute a release or waiver of any pension, retirement, workers compensation or similar benefits to which plaintiffs may be entitled as a consequence of their employment with the State of Connecticut, nor shall this document constitute a release or waiver of any rights the release of which is prohibited by law.

3. The plaintiffs represent that, consistent with the Older Workers Benefit Protection Act of 1990, they have been advised to, and have had the opportunity to, seek the advice and

assistance of counsel with regard to this Agreement and release provision, that they are advised that they have at least 21 days within which to consider its terms and understand that they have up to seven days after signing this Agreement and release provision to revoke it and that the benefits provided pursuant to this Agreement are benefits to which they would not have been entitled had they not signed the Agreement and release provision. This Agreement and release provision will not become effective or enforceable until the eighth day after signing by all of the plaintiffs. Plaintiffs understand that if they wish to revoke this Agreement and release provision during the seven days after having signed it, they may do so by delivering written notice to Assistant Attorney General Margaret Q. Chapple, Office of the Attorney General, 55 Elm Street, Hartford, CT 06106. In the event that any of the plaintiffs exercise their right to revoke this Agreement and release provision in accordance with this paragraph, the entire Agreement shall become null and void.

4. The State of Connecticut agrees to pay the plaintiffs Two Million, Five Hundred Thousand Dollars (\$2,500,000.00), inclusive of attorney's fees and costs, as compensation for alleged personal injuries, by way of a check made payable to Attorney David N. Rosen and Attorney Antonio Ponvert III, trustees. The State of Connecticut further agrees to make a payment to the plaintiffs' counsel in the amount of Four Hundred Seventy Five Thousand Dollars (\$475,000.00), as compensation for attorney's fees incurred in this action, by way of a check made payable to Attorney David N. Rosen and Attorney Antonio Ponvert III. These payments will constitute full and complete settlement of any and all claims arising from the above-entitled action. The parties will each bear their own costs, fees and expenses, including any attorneys' fees. The

settlement sums shall be paid no later than thirty days after the execution of this Agreement, receipt of completed W-9 tax forms from Attorneys Rosen and Ponvert, receipt of a copy of the Stipulation of Dismissal as referenced in paragraph 1 above and approval by the Connecticut General Assembly, pursuant to the provisions of Conn. Gen. Stat. §3-125a. Attorneys Rosen and Ponvert each agrees to provide the defendants' counsel with a completed W-9 tax form, and the parties understand that the State of Connecticut will issue a form 1099 for the 2009 tax year for the amount of such payment. The State of Connecticut makes no representations or warranties regarding the issue of any tax liability of the plaintiffs or their counsel in relation to the settlement payments and encourages the plaintiffs and their counsel to seek the advice of an accountant or tax attorney.

5. It is agreed and understood that the plaintiffs shall not use this Agreement against the defendants in any pending or future legal proceedings, except as may be necessary to enforce this Agreement, and that the evidence underlying the claims will not be used as the basis for any future claims.

6. It is expressly agreed and understood by the parties that the defendants deny any unlawful conduct and that the payment of the aforesaid sums is not intended to constitute, nor shall it be regarded as, an admission of liability on the part of the defendants, the State of Connecticut, the Office of the Attorney General, or any of their present or former officers, agents or employees, including individuals named in plaintiffs' complaints. Rather, this Agreement between the parties constitutes a compromise settlement of the matters stated in the complaint

and amended complaints in this case for the sole purpose of avoiding further expense and inconvenience to both parties in pursuing or defending this matter as might otherwise be required.

7. The parties expressly acknowledge that this Agreement is intended to, and shall, constitute full and final settlement of all claims and/or rights of action which have arisen, or may in the future arise, out of any of the facts and circumstances which are the subject of or related to the above entitled complaint, including, but not limited to, such claims as may be cognizable under Title VII, ADEA, federal law, the United States Constitution, the Connecticut Constitution, and state law or common law claims, including negligent and intentional infliction of emotional distress, as more fully reflected in the release of liability contained in paragraph 2 above.

8. The parties understand and agree that this Agreement is not effective until it is signed by all parties and approved by the Connecticut General Assembly, pursuant to the provisions of Conn. Gen. Stat. §3-125a.

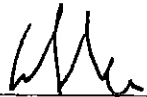
THE REMAINDER OF THIS PAGE IS INTENTIONALLY LEFT BLANK



PLAINTIFFS  
MAUREEN ALLEN, ET AL.

Signed this 24<sup>th</sup> day of March, 2009

BY: \_\_\_\_\_

  
Antonio Ponvert III  
Fed Bar No. ct17516  
Koskoff, Koskoff & Bieder P.C.  
350 Fairfield Avenue  
Bridgeport, CT 06604  
Tel: 203-336-4421  
Fax: 203-368-3244  
E-mail: [aponvert@koskoff.com](mailto:aponvert@koskoff.com)

PLAINTIFF  
JANE DOE ONE

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2009

BY: \_\_\_\_\_

David N. Rosen  
Fed Bar No. ct00196  
David Rosen & Associates, P.C.  
400 Orange Street  
New Haven, CT 06511  
Tel: 203-787-3513  
Fax: 203-789-1605  
E-mail: [drosen@davidrosenlaw.com](mailto:drosen@davidrosenlaw.com)

PLAINTIFFS  
MAUREEN ALLEN, ET AL.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2009 BY: \_\_\_\_\_

Antonio Ponvert III  
Fed Bar No. ct17516  
Koskoff, Koskoff & Bieder P.C.  
350 Fairfield Avenue  
Bridgeport, CT 06604  
Tel: 203-336-4421  
Fax: 203-368-3244  
E-mail: [aponvert@koskoff.com](mailto:aponvert@koskoff.com)

PLAINTIFF  
JANE DOE ONE

Signed this 25<sup>th</sup> day of March, 2009 BY: \_\_\_\_\_

David N. Rosen  
Fed Bar No. ct00196  
David Rosen & Associates, P.C.  
400 Orange Street  
New Haven, CT 06511  
Tel: 203-787-3513  
Fax: 203-789-1605  
E-mail: [drosen@davidrosenlaw.com](mailto:drosen@davidrosenlaw.com)

DEFENDANTS  
JOHN J. ARMSTRONG, ET AL.

RICHARD BLUMENTAL  
ATTORNEY GENERAL

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2009

BY:

\_\_\_\_\_  
Margaret Q. Chapple  
Fed Bar No. ct05550

Jane B. Emons  
Fed Bar No. ct16515

Terrence M. O'Neill  
Fed Bar No. ct10835

Assistant Attorneys General  
55 Elm Street  
Hartford, CT 06106  
Tel: 860-808-5340  
Fax: 860-808-5383  
E:mail: [margaret.chapple@po.state.ct.us](mailto:margaret.chapple@po.state.ct.us)

EXHIBIT A

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

MAUREEN ALLEN, ET AL.,	:	CIVIL ACTION NO.
<i>Plaintiffs</i>	:	3:02CV1370(AVC)
	:	
v.	:	
	:	
JOHN J. ARMSTRONG, ET AL.,	:	
<i>Defendants</i>	:	March 13, 2009

STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Rule 41(a)(1)(ii) of the Federal Rules of Civil Procedure, the plaintiffs and the defendants hereby stipulate to a dismissal with prejudice of the above-captioned matter without any award of attorney's fees or costs to any party.

PLAINTIFFS  
MAUREEN ALLEN, ET AL.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2009

BY:

\_\_\_\_\_  
Antonio Ponvert III  
Fed Bar No. ct17516  
Koskoff, Koskoff & Bieder P.C.  
350 Fairfield Avenue  
Bridgeport, CT 06604  
Tel: 203-336-4421  
Fax: 203-368-3244  
E-mail: [aponvert@koskoff.com](mailto:aponvert@koskoff.com)

PLAINTIFF  
JANE DOE ONE

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2009

BY: \_\_\_\_\_

David N. Rosen  
Fed Bar No. ct00196  
David Rosen & Associates, P.C.  
400 Orange Street  
New Haven, CT 06511  
Tel: 203-787-3513  
Fax: 203-789-1605  
E-mail: [drosen@davidrosenlaw.com](mailto:drosen@davidrosenlaw.com)

DEFENDANTS  
JOHN J. ARMSTRONG, ET AL.

RICHARD BLUMENTHAL  
ATTORNEY GENERAL

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2009

BY: \_\_\_\_\_

Margaret Q. Chapple  
Assistant Attorney General  
Federal Bar No. ct05550  
55 Elm Street - P.O. Box 120  
Hartford, CT 06141-0120  
Tel: (860) 808-5340  
Fax: (860) 808-3583  
E-mail: [margaret.chapple@po.state.ct.us](mailto:margaret.chapple@po.state.ct.us)

PLAINTIFF

\_\_\_\_\_  
MAUREEN ALLEN

STATE OF CONNECTICUT        )  
  )       SS.  
COUNTRY OF \_\_\_\_\_ )

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared MAUREEN ALLEN, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
PAULETTE WILLIAMS

STATE OF CONNECTICUT       )  
  )  
COUNTRY OF \_\_\_\_\_ )       SS.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared PAULETTE WILLIAMS, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
DENNA STANLEY

STATE OF CONNECTICUT        )  
  )       SS.  
COUNTRY OF \_\_\_\_\_ )

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared DENNA STANLEY, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court



PLAINTIFF

\_\_\_\_\_  
DANIELLE LOCAS

STATE OF CONNECTICUT     )  
  )     SS.  
COUNTRY OF \_\_\_\_\_ )

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared DANIELLE LOCAS, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
TANJORIE R. GODWIN

STATE OF CONNECTICUT       )  
  )  
COUNTRY OF \_\_\_\_\_ )       SS.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared TANJORIE R. GODWIN, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
REGINA T. ARANGO

STATE OF CONNECTICUT        )  
  )       SS.  
COUNTRY OF \_\_\_\_\_ )

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared REGINA T. ARANGO, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
BARBARA J. HAWKINS

STATE OF CONNECTICUT       )  
  )  
COUNTRY OF \_\_\_\_\_ )       SS.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared BARBARA J. HAWKINS, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
CAROL NEWMAN

STATE OF CONNECTICUT       )  
  )  
COUNTRY OF \_\_\_\_\_ )       SS.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared CAROL NEWMAN, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
CATHERINE OSTEN

STATE OF CONNECTICUT       )  
  )  
COUNTRY OF \_\_\_\_\_ )       SS.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared CATHERINE OSTEN, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
JANE DOE ONE

STATE OF CONNECTICUT        )  
  )       SS.  
COUNTRY OF \_\_\_\_\_ )

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared JANE DOE ONE, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
JANE DOE TWO

STATE OF CONNECTICUT       )  
  )  
COUNTRY OF \_\_\_\_\_ )       SS.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared JANE DOE TWO, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court



PLAINTIFF

\_\_\_\_\_  
JANE DOE THREE

STATE OF CONNECTICUT       )  
  )  
COUNTRY OF \_\_\_\_\_ )       SS.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared JANE DOE THREE, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
GWENDOLYN FULLER-LYNCH

STATE OF CONNECTICUT       )  
  )  
COUNTRY OF \_\_\_\_\_ )       SS.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared GWENDOLYN FULLER-LYNCH, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
VIRGINIA JOHNSON

STATE OF CONNECTICUT       )  
  )  
COUNTRY OF \_\_\_\_\_ )       SS.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared VIRGINIA JOHNSON, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
KATHERINE JOHNSTON

STATE OF CONNECTICUT       )  
  )  
COUNTRY OF \_\_\_\_\_ )       SS.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared KATHERINE JOHNSTON, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
FERNE McALLISTER

STATE OF CONNECTICUT        )  
  )       SS.  
COUNTRY OF \_\_\_\_\_ )

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared FERNE McALLISTER, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PLAINTIFF

\_\_\_\_\_  
AUDREY RIGGINS

STATE OF CONNECTICUT       )  
  )  
COUNTRY OF \_\_\_\_\_ )       SS.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared AUDREY RIGGINS, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court

PL AINTIFF

\_\_\_\_\_  
JANET WADE

STATE OF CONNECTICUT       )  
  )  
COUNTRY OF \_\_\_\_\_ )     SS.

On this the \_\_\_\_\_ day of \_\_\_\_\_, 2009, before me, the undersigned officer, personally appeared JANET WADE, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purpose therein contained, as her free act and deed.

IN WITNESS WHEREOF, I have hereto set my hand and official seal.

\_\_\_\_\_  
Notary Public  
Commissioner of the Superior Court